

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	
INLAND ENVIRONMENTAL AND REMEDATION, INC.	§	CASE NO. 16-34624
	§	
Debtor	§	CHAPTER 11
	§	

**JOINT MOTION OF DEBTOR AND JOHN DEERE CONSTRUCTION & FORESTRY
COMPANY FOR APPROVAL OF AGREED ORDER ABANDONING
CERTAIN PERSONAL PROPERTY OF THE ESTATE**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE JEFF BOHM
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Inland Environmental and Remediation, Inc., the Chapter 11 Debtor herein and John Deere Construction & Forestry (“Deere”), a party in interest herein, files this Joint Motion for Approval of Agreed Order permitting Debtor to abandon certain personal property of the estate pursuant to Bankruptcy Rule 6007(a) and 11 U.S.C. § 554(a) and in

support thereof respectfully shows the Court the following:

1. Jurisdiction is conferred on this Court pursuant to 28 U.S.C. §§ 157 and 1334.

This is a core proceeding under 28 U.S.C. § 157(b)(2).

2. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The Debtor filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code on September 14, 2016. From and since the date of the petition, except as provided herein, Debtor has maintained possession of its property and continues to remain in control of its ongoing business affairs as Debtor in-possession pursuant to the provisions of 11 U.S.C. §§ 1107 and 1108.

4. On or about October 11, 2016 Debtor filed its schedules and statement of financial affairs.

5. The Debtor has agreed to abandon certain personal property consisting of the following four (4) pieces of which were repossessed by Deere in November, 2015 (the “Equipment”): One John Deere Model 844K Wheel Loader s/n 1DW844KXKDE655784; and three John Deere 460E Articulated Dump Trucks, Vin Nos. 1DW460ETKCE649332, 1DW4SOETVCE649559 and 1DW460ETEDE650587. Deere gave its notices of sale many months ago. However, due to the nature of the Equipment, completion of the sales of the Equipment have not occurred.

6. The Debtor seeks authority to abandon the equipment pursuant to Bankruptcy Rule 6007 and 11 U.S.C. § 554(a) pursuant to an agreement with Deere, as a party-in interest. Bankruptcy Code section 554(a) provides that a trustee may abandon “property of the estate that is burdensome to the estate or that is of inconsequential value and benefit to the

estate.” 11 U.S.C. § 554(a).

7. The Debtor has not had use of the Equipment for almost a year and has no equity in the Equipment. Consequently, the Debtor has determined the Equipment is of inconsequential value or benefit to the estate, and should therefore be abandoned. Further, any recover of, retention of the Equipment would be burdensome to the bankruptcy estate. Deere repossessed the Equipment in November of 2015 and has already given its notices of sale. Therefore, the Debtor, along with Deere, seek approval of their agreement to abandon the Equipment, to the extent such Equipment is property of the bankruptcy estate, and hereby give notice of the proposed abandonment. A copy of the Agreed Order abandoning the equipment is attached to this Motion.

8. By this motion, the Debtor does not at this time intend to abandon any claims, causes of action, receivables, licenses or other intangibles that may comprise the Debtor’s bankruptcy estate, or any subsequently discovered assets of the Debtor’s estate.

9. The parties request the Court approve the Agreed Order abandoning the Equipment.

WHEREFORE PREMISES CONSIDERED, Debtor and Deere respectfully request that the Court approve Debtor’s the Agreed Order abandoning the Equipment and grant the parties such other and further relief, both general and special to which it may be justly entitled.

Respectfully submitted,

By: /s/ Richard L. Fuqua
Richard L. Fuqua
SBN 07552300
5005 Riverway, Suite 250
Houston, TX 77056
Phone: (713) 960.0277
Fax: (713) 960-7064
rlfuqua@fuqualegal.com

ATTORNEY FOR DEBTOR

LAW OFFICES OF T. H. KELLEY, P.C.

By: /s/ Teri H. Kelley
Teri H. Kelley
SBN 10176900
6750 West Loop S., Ste 920
Bellaire, TX 77401
Phone: (832) 485-3515
Fax: (832) 485-3517
tk@thkelleylaw.com

**ATTORNEY FOR JOHN DEERE
CONSTRUCTION & FORESTRY COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2016, a true and correct copy of the above and foregoing Joint Motion of Debtor and John Deere Construction & Forestry Company for Approval of Agreed Order Abandoning Certain Personal Property of the Estate was served on the following parties by the following means:

Debtor (by regular first class mail)

Inland Environmental and Remediation, Inc.
1022 Schultz Road
Columbus, TX 78934

Debtor's Attorney (Via ECF)

Richard L. Fuqua whose email address is fuqua@fuqualegal.com

U.S. Trustee (Via regular first class mail & ECF)

Christine March whose email address is: christine.a.march@usdoj.gov
Office of the U.S. Trustee
515 Rusk, Ste 3516
Houston, TX 77002

Counsel for Counsel for Official Committee of Unsecured Creditors Committee(Via ECF)

Bennett G. Fischer whose email address is bgf@fisherlaw.net

Official Committee of Unsecured Creditors:

Cook-Joyce, Inc., c/o Stacey Granger, whose email is: stacey.granger@cook-joyce.com
Cinco J d/b/a Johnson Oil Co., c/o Debra Goodwin whose email is: dgoodwin@joc-tigertote.com
Fitzgerald Trucking Inc., c/o Holly Fitzgerald whose email is: hollyn.fitzgerald@att.net

Other parties requesting notice(Via ECF)

Owen Sonik whose email is: osonik@pbfcm.com
Gregory M. Weinstein whose email is: gweinstein@weinrad.com
Jeffrey D. Stewart whose email is: jstewart@wellscuellar.com
William S. Chesney whose email is: wchesney@felct.com
John Castillo whose email is: jcastillo@fcbtxlaw.com
Steven A. Leyh whose email is: sleyh@leyh-payne.com

All other creditors and parties in interest (via the Court's ECF filing system or by regular first class mail as set forth on attached service list.)

/s/ Teri H. Kelley
Teri H. Kelley

Label Matrix for local noticing
0541-4
Case 16-34624
Southern District of Texas
Houston
Mon Dec 5 10:50:47 CST 2016

Colorado County and Milano Independent Schoo
c/o John T. Banks
3301 Northland Drive, Suite 505
Austin, TX 78731-4954

G&K Services, Co
Attn: Russell Harsch
7355 Denny St.
Houston, Tx 77040-4848

Inland Environmental and Remediation, Inc.
1022 Schultz Rd.
Columbus, TX 78934-4969

Komatsu Financial Limited Partnership
c/o Ben L. Aderholt
9 Greenway Plaza
Suite 1100
Houston, TX 77046-3653

Maverick Field Services, LLC and Maverick Fi
c/o Matthew T. Taplett, Esq.
500 W.7th St. #600
Fort Worth, TX 76102-4751

ADP Inc.
P.O. Box 842875
Boston, MA 02284-2875

ARA Transportation
1000 River Rd Ste L
San Marcos, TX 78666-8046

AT & T Mobility
P O Box 6463
Carol Stream, IL 60197-6463

AT&T Corp.
c/o AT&T Services, Inc.
Karen A. Cavagnaro-Lead Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921-2693

ATL-Transportation LLC
PO Box 617
Kyle, TX 78640-0617

ATT-2576
PO Box 105414
Atlanta, GA 30348-5414

ATT-2798
PO Box 5019
Carol Stream, IL 60197-5019

Action Resources, Inc.
Dept # 1563
PO Box 11407
Birmingham, AL 35246-1563

(p)AIRGAS USA LLC
110 WEST 7TH STREET
SUITE 1300
TULSA OK 74119-1106

Alamo Lumber Company
PO Box 17258
San Antonio, TX 78217-0258

Allgayer, Inc
P.O. Box 611
El Campo, TX 77437-0611

Amp Control Electric Ltd.
c/o Stephen D. Finch
105 W. Donegan St.
Seguin, TX 78155-6117

Aqua Beverage Company
701-A West Jackson
El Campo, TX 77437-4141

Armadillo Portable Toilets
P O Box 246
Columbus, TX 78934-0246

B Environmental
1606 E Brazos, Suite D
Victoria, TX 77901-5532

BAK Trucking Inc
P O Box 154
Moulton, TX 77975-0154

BB&T/CSC Logic
P.O. Box 1518
Coppell, TX 75019-1518

Bartlett Electric Cooperative Inc.
P.O. Box 200
27492 Highway 95
Bartlett, TX 76511-0200

Boundary Ventures, Inc.
1022 Schultz Rd.
Columbus, TX 78934-4969

Bradley W. Cole
507 N. Sam Houston Pkwy Suite 296
Houston, TX 77060-4068

Brenham Electric Motor Service
801 S Blue Bell Rd
Brenham, TX 77833-4407

Bryan Hose and Gasket
1800 Quality Park Lane
P.O. Box 2320
Bryan, TX 77806-2320

Bulverde Auto & Truck Supply
20475 Hwy 46 W Suite 340
Spring Branch, TX 78070-6147

Butch's Rat Hole & Anchor Serv
PO Box 1323
Levelland, TX 79336-1323

Byron Watson Trucking Inc.
PO Box 250
Kirbyville, TX 75956-0250

Capital One
PO Box 60024
New Orleans, LA 70160-0024

Capital One Bank
PO Box 1801
Laurel, MD 20725-1801

Caterpillar Financial Services
PO Box 340001
Nashville, TN 37203-0001

Champion Septic Services
6977 FM 2319
Loraine, TX 79532-2905

Chrysler Capital
P.O. Box 961278
Fort Worth, TX 76161-0278

Cinco J., Inc. dba Johnson Oil Company
c/o Donna Brown, P.C.
1250 S. Capital of Texas Highway
Building I, Suite 320
Austin, TX 78746-6446

Cintas - Altair
Loc. #082
PO Box 650838
Dallas, TX 75265-0838

Cintas - Milano #86
PO BOX 650838
Dallas, TX 75265-0838

Cintas - RUS
c/o Allen D. Russell
Taylor Taylor & Russell
2777 Allen Parkway, Ste. 1000
Houston, TX 77019-2165

Coastal Engine & Compression
PO Box 951
Edna, TX 77957-0951

Colorado County Appraisal District
P.O. Box 10
Columbus, TX 78934-0010

Columbus Bearing & Industrial Sup
P.O. BOX 2112
Victoria, TX 77902-2112

Company Wrench
4805 Scooby Ln
Carroll Ohio 43112-9446

Compliant Resolutions
2126 Wilderness Point Drive
Kingwood, TX 77339-2205

Comptroller of Public Accounts
C/O Office of the Attorney General
Bankruptcy - Collections Division MC-008
PO Box 12548
Austin TX 78711-2548

(p)TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION
PO BOX 13528
AUSTIN TX 78711-3528

Cook-Joyce Inc.
812 W 11th St.
Austin, TX 78701-2000

Cortex Business Solutions USA
PO Box 572260
Houston, TX 77257-2260

Cross Roads Oil Field Supply LTD
P O Box 1546
El Campo, TX 77437-1546

Crowe Company
PO Box 234
Milano, TX 76556-0234

D & B Services
P O Box 1483
Victoria, TX 77902-1483

DISA Inc
Dept 890314
PO Box 120314
Dallas, TX 75312-0314

DNOW L.P
PO BOX 200822
Dallas, TX 75320-0822

DUCKETT, BOULIGNY & COLLINS
PO Box 1567
El Campo, TX 77437-1567

Dan L. Fulkerson
2900 North Loop West, Suite 500
Houston, TX 77092-8826

David Polston
P O Box 398
Columbus, TX 78934-0398

Doggett Heavy Machinery Serv
9111 North Freeway
Houston, TX 77037-2038

EMEDCO INC
PO Box 369
Buffalo, NY 14240-0369

ERGOS Technology
3831 Golf Drive
Houston, TX 77018-5218

Emedco Inc
39209 Treasury Center
Chicago, IL 60694-9200

Encore Industrial Products
PO BOX 300
Barker, TX 77413-0300

Energes, LLC
c/o Andrew Ketner
Hughes Arrell Kinchen LLP
1221 McKinney, Ste. 3150
Houston, TX 77010-2034

Excel Micro, LLC
PO Box 9515
New York, NY 10087-4515

Fedex
P O Box 660481
Dallas, TX 75266-0481

First Insurance Funding Corp.
PO Box 7000
Carol Stream, IL 60197-7000

Fitzgerald Trucking
P.O. Box 433
Minco, OK 73059-0433

Frank A. Piazza, Jr.
820 Gessner, Suite 1075
Houston, TX 77024-4496

Frank Surveying Company Inc.
2205 Walnut Street
Columbus, TX 78934-5008

G&K Services
PO BOX 842385
Boston, MA 02284-2385

GBH CPAs, PC
6002 Rogerdale Road, Suite 500
Houston, TX 77072-1660

GCR Tires & Service
PO Box 910530
Denver, CO 80291-0530

Garland Sandhop, Jr.
Attorney at Law
104 Regency Avenue
Victoria, TX 77904-2480

Goldberg Asset Monitoring LLC
19315 Bartlett Bay
San Antonio, TX 78258-3845

Grainger Dept 849833462
PO Box 419267
Kansas City, MO 64141-6267

Gulf Coast Accusearch
2129 FM 2920 #190-119
Spring, TX 77388-3671

Gyrodata Incorporated
Marco A. Castilla
23000 Northwest Lake Dr.
Houston, TX 77095-5344

HCTRA - Violations DEPT 1
PO BOX 4440
Houston, TX 77210-4440

Hance Scarborough et al
400 W. 15th Street, Suite 950
Austin, TX 78701-1696

Harris County Rentals
24010 Tomball Pkwy
Tomball, TX 77375-8221

Hill Country Springs
PO Box 2220
Manchaca, TX 78652-2220

Hutchison Hayes Separation Inc.
Dept. 3256
PO Box 123256
Dallas, TX 75312-3256

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Ira Testers
PO Bcx 195
Ira, TX 79527-0195

Iron Mountain
PO Box 915004
Dallas, TX 75391-5004

J & W Auto Parts
205 FM 3013
Eagle Lake, TX 77434

Jackson Walker L.L.P.
P.O. Box 130989
Dallas, TX 75313-0989

Johnson Oil Company
PO Drawer 1959
Gonzales, TX 78629-1459

Ken Owens
PO Box 4121
Roswell, NM 88202-4121

Kerley & Sears, Inc
4331 Cement Valley Rd.
Midlothian, TX 76065-5307

Kimball Midwest
Dept. L-2780
Columbus, Ohio 43260-2780

Knife River
PO Box 674
Bryan, TX 77806-0674

(p)KOMATSU FINANCIAL LIMITED PARTNERSHIP
1701 W GOLF ROAD SUITE 1-300
ROLLING MEADOWS IL 60008-4208

Krause & Associates LP
504 West 13th Street
Austin, Texas 78701-1839

Kubco
Attn: Accts Receivable
8031 Breen Rd
Houston, TX 77064-8417

Lake Lumber Co Inc
200 Glen Flora Road
Eagle Lake, TX 77434-2857

Lavaca County Office Supply Inc.
South Texas School Furniture
PO Box 372
Hallettsville, TX 77964-0372

Lease Consultants
PO Bcx 71397
Des Moines IA 50325-0397

MTX Transport Riviera Finance
P.O. Box 202487
Dallas, TX 75320-2487

MVC Environmental Corp.
1918 Rachel Ln.
Round Rock, TX 78664-7454

Machinery Maintenance Rebuilders
6927 Brittmoore Rd.
Houston, TX 77041-3307

Martin & Drought PC
Bank of America Plaza 25th Floor
300 Convent Street
San Antonio, TX 78205-3789

Martin Electric Co. Inc.
1504 W. Jackson St.
El Campo, TX 77437-9310

Maverick Field Services Logistics
PO BOX 262
La Grange, TX 78945-0262

Memorial Hospital
PO BOX 587
Gonzales, TX 78629-0587

Messy Oil & Gas
6690 Highway 71
Garwood, TX 77442-4166

Milano Water Supply
P O Box 181
Milano, TX 76556-0181

Mustang Rental Services
PO Box 4346, Dept 188
Houston, TX 77210-4346

Northern Safety and Industrial
P O Box 4250
Utica, NY 13504-4250

Nueces Power Equipment
PO Box 4789
Corpus Christi, TX 78469-4789

Office Depot
PO Box 88040
Chicago IL 60680-1040

Ofi Testing Equipment
11302 Steeplecrest Drive
Houston, TX 77065-5649

Oil Patch Downhole Services, Inc.
c/o Holly Hamm
Snow Spence Green LLP
2929 Allen Parkway, Ste. 2800
Houston, TX 77019-7100

PCI Plate Cut Inc
7218 Canal St.
Houston, TX 77011-2766

PX Transportation DBA Star Bulk
4650 FM 482
New Braunfels, TX 78132-4927

Patriot Oilfield Services, LLC
101 W Goodwin
Victoria, TX 77901-6548

PaveTex Engineering and Testing
3989 Highway 290 East
Dripping Springs, TX 78620-4287

Pierpont Communications
1800 West Loop South, Suite 800
Houston, TX 77027-3261

Pioneer Oilfield Trucking Inc.
P O Box 5774
Victoria, TX 77903-5774

Pioneer Oilfield Trucking, Inc.
Garland Sandhop, Jr., Esq.
104 Regency Avenue
Victoria, TX 77904-2480

Pitney Bowes Global Financial Svc
P O Box 371887
Pittsburgh, PA 15250-7887

Pitney Bowes Purchase Power
P O Box 371874
Pittsburgh, PA 15250-7874

Polar Ice Inc.
PO Box 2312
Brenham, TX 77834-2312

Praxair
P O Box 120812 Dept 0812
Dallas, TX 75312-0812

Pro Field Services Inc.
P.O. Box 525
Hallettsville, TX 77964-0525

ProSearch USA LLC
5150 Broadway St, Suite 490
San Antonio, TX 78209-5710

Progressive County Mutual Ins. Co.
P.O. Box 105428
Atlanta, GA 30348-5428

Progressive Waste Solutions TX
North Central Texas District
PO Box 650308
Dallas TX 75265-0308

Pump & Power Equipment LLC
PO BOX 450270
Houston, TX 77245-0270

Quality Electric Inc
1004 Collingsworth
Houston, TX 77009-4999

Quill Corporation
PO Box 37600
Philadelphia, PA 19101-0600

R Construction Company
PO Box 189
Buffalo, TX 75831-0189

R. W. Byram & Company
25 N. Main St.
Elgin, TX 78621-2657

RBR Oil
c/o Stuart Maxey
Bradley Arant Boulton Cummings LLP
1819 Fifth Avenue North
Birmingham, AL 35203-2120

Rhino Trucking
P.O. Box 11
Snyder, TX 79550-0011

Rice Medical Center
P O Box 277
Eagle Lake, TX 77434-0277

Richard Munoz Trucking LLC
Riveria Finance
P.O. Box 202485
Dallas, TX 75320-2485

Rigdata
P O Box 820547
Fort Worth, TX 76182-0547

Riviera Finance
C/O Fry Enterprises
819 Indian Run Dr
Pflugerville, TX 78660-3871

Riviera Finance of Texas Inc
Daniel W. Mourning Esq. Legal Cnsl
5506 Sunol Blvd Ste 203
Pleasanton CA 94566-7779

Rockdale Welding Supply
2004 W Cameron Ave
Rockdale, TX 76567-2617

SJ Trucking LLC
2105 FM 1470
Poteet, TX 78065-4326

SOB Transportation
6690 Highway 71
Garwood, TX 77442-4166

Sage Environmental Consulting LP
PO Box 1883
San Antonio, TX 78297-1883

San Bernard Electric Coop Inc
P O Box 309
Columbus, TX 78934-0309

Scherwman Trucking
62522 Collections Center Drive
Chicago, IL 60693-0625

Schwerman Trucking Co
611 South 28 Street
Milwaukee WI 53215-1200

Screiber, LLC
c/o Kellye M. Walne
Walne Law, PLLC
4900 Woodway, Ste. 975
Houston, TX 77056-1860

Silver Eagle Environmental Sol.
191 Beechcraft Lane
Sequin, TX 78155-2512

Sparkletts Standard
PO Box 660579
Dallas, TX 75266-0579

State Tax Advisors LP
1308 Kingwood Drive, #102
Kingwood, TX 77339-2972

Stewart Organization
PO Box 166708
Irving, TX 75016-6708

Strouhal Tire Recapping Plant
PO Box 1000
El Campo, TX 77437-1000

SunTrust Bank
Attn: Support Services
P.O. Box 85092
Richmond, VA 23286-0001

SunTrust Bank, Support Services
Bankruptcy Dept, PO Box 85092
Richmond, VA 23285-5092

TSI Laboratories
1810 South Laurent
Victoria, TX 77901-9490

TXU Energy Retail Company LLC
C/O Bankruptcy Department
PO Box 650393
Dallas TX 75265-0393

Takeuchi Financial Services
c/o James Roach, VP
475 Sansome Street, 19th Floor
San Francisco, CA 94111-3172

Texas Disposal Systems Inc.
PO Box 660816
Dallas, TX 75266-0816

Texas Process Equipment
DEPT 678
PO BOX 4346
Houston, TX 77210-4346

Texas Propane
PO Box 429
Hwy 77 North
Rockdale, TX 76567-0429

The Witherspoon Law Firm
9210 Larston St.
Houston, TX 77055-6418

Tommie Vaughn Auto Country
PO Box 550
Columbus, TX 78934-0550

TxTag
PO Box 650749
Dallas, TX 75265-0749

Ty J. Wood
PO Box 1069
Colorado City, TX 79512-1069

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

Uline Attn: Accts. Receivable
PO Box 88741
Chicago, IL 60680-1741

Uline Shipping Supplies
12575 Uline Drive
Pleasant Prairie, WI 53158-3686

(p)UNITED RENTALS NORTH AMERICA INC
3200 HARBOR LN N
MINNEAPOLIS MN 55447-5295

Unum Life Insurance Company
PO Box 409548
Atlanta, GA 30384-9548

Waukesha-Pearce Industries Inc
P.O BOX 204116
Dallas, TX 75320-4116

Waukesha-Pearce Industries, Inc.
P.O. Box 35068
Houston, TX 77235-5068
7 77235-5068

Wells Fargo Equipment Finance
NW-5934
P O Box 1450
Minneapolis, MN 55485-5934

Wholesale Chemical Company Inc
PO Box 130028
The Woodlands TX 77393-0028

XTIRI
PO Box 2947
St. George, UT 84771-2947

Yancey Transportation
P.O. Box 2824
Conroe, TX 77305-2824

i
a

i
a

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	
INLAND ENVIRONMENTAL AND REMEDiation, INC.	§	CASE NO. 16-34624
	§	
Debtor	§	CHAPTER 11
	§	

**AGREED ORDER ON JOINT MOTION OF DEBTOR AND JOHN DEERE
CONSTRUCTION & FORESTRY COMPANY FOR APPROVAL OF AGREED ORDER
ABANDONING CERTAIN PERSONAL PROPERTY OF THE ESTATE**

Came on for consideration the Joint Motion of Debtor and John Deere Construction and Forestry Company for Approval of Agreed Order Abandoning Certain Personal Property of the Estate, and the Court finds that notice of the Motion was sufficient and there having been no timely objection or other response to the Motion, the allegations in the Motion stand unopposed, and therefore finds the below described property burdensome to the estate, and is of inconsequential value and benefit to the estate; and the Court is of the opinion that this Agreed Order should be approved.

IT IS THEREFORE ORDERED ADJUDGED AND DECREED THAT the following described property is hereby **DEEMED ABANDONED:**

1. One John Deere Model 844K Wheel Loader s/n 1DW844KXKDE655784;
2. Three John Deere 460E Articulated Dump Trucks, Vin Nos. 1DW460ETKCE649332, 1DW4SOETVCE649559 and 1DW460ETEDE650587

SIGNED this ____ day of _____, 2016.

Jeff Bohm
U.S. Bankruptcy Judge

APPROVED AND AGREED AS TO SUBSTANCE AND FORM:

By: /s/ Richard L. Fuqua

Richard L. Fuqua
SBN 07552300
5005 Riverway
Suite 250
Houston, TX 77056
Phone: (713) 960-0277
Fax: (713) 960-1064
rlfuqua@fuqualegal.com

ATTORNEY FOR DEBTOR

LAW OFFICES OF T. H. KELLEY, P.C.

By: /s/ Teri H. Kelley

Teri H. Kelley
SBN 10176900
6750 West Loop S., Ste 920
Bellaire, TX 77401
Phone: (832) 485-3515
Fax: (832) 485-3517
tk@thkelleylaw.com

ATTORNEY FOR JOHN DEERE
CONSTRUCTION & FORESTRY COMPANY